

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF IOWA

IN RE: QHC FACILITIES, LLC, <i>et al.</i> , Debtors.	Chapter 11 Bankruptcy Case No. 21-01643 MOTION FOR SUMMARY JUDGMENT
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COMES NOW Cedar Healthgroup, LLC (“Cedar Health”), and hereby respectfully submits this Motion for Summary Judgment, pursuant to F.R.B.P. 7056 and 9014, and incorporates by this reference as if set forth verbatim the Brief, Statement of Facts, and Exhibits filed simultaneously herewith.

WHEREFORE, Cedar Health respectfully prays this Court enter and enroll an Order denying and overruling the Debtors’ “Emergency” Motion, Dkt #221 (filed Mar. 23, 2022), with respect to the issue of Deposit retention, and direct the Debtors to forthwith release and return the \$605,000 Deposit to Cedar Health, and for such other relief as may be just and proper under the premises.

/s/ Abram V. Carls
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Certificate of Service

The undersigned certifies, under penalty of perjury, that on this 26th day of May, 2022, the foregoing document was electronically filed with the Clerk of Court using the Southern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

/s/ Abram V. Carls